

## Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

### Section I: Efforts to Reach Regulatory Goals

*EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government*

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

a. Cluster GS-1 to GS-10 (PWD)

Answer No

b. Cluster GS-11 to SES (PWD)

Answer No

AT the beginning of FY18 the SDNG had 20 full time positions eligible to be held by a PWD/PWTD. The SDNG transitioned 12.6% of the workforce from Title 32 dual status military technicians to Title 5 civilian excepted technicians. This transition occurred between April and September of 2018. This transition resulted in over 75 positions newly opened to the civilian labor force and the potential to consider schedule A hiring. The majority of the personnel in these positions were former Title 32 dual status military technicians and most continue to serve in the national guard. The B Tables indicate improvement in our total workforce from FY17 to 18 in voluntary reporting of PWD at 22, up 8 from FY17 and PWTD at 2, up 2 from FY17. In our Title 5 workforce of 75 employees the PWD = 12 or 16% and the PWDT = 1 or 1.33%. Based on these percentages we do not have a trigger in the areas of PWD. We fall just short of the 2% goal of PWTD at 1.33%, however with FY19 being the first full year under the conversion and we intend to resurvey our personnel in FY19, and feel we cannot confirm the trigger until after the survey is completed.

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

a. Cluster GS-1 to GS-10 (PWTD)

Answer No

b. Cluster GS-11 to SES (PWTD)

Answer No

We fall just short of the 2% goal of PWTD at 1.33%, however with FY19 being the first full year under the conversion and we intend to re-survey our personnel in FY19, and cannot confirm the trigger until after the survey is completed. With a broader civilian workforce, the opportunities for PWD/PWTD to apply and work for our agency will increase. The majority of the personnel converted to the Title 5 civilian positions are currently drilling guard personnel, required to meet military medical standards for serving and generally do not have any disabilities.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	109	8	7.34	1	0.92

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-11 to SES	131	8	6.11	0	0.00

3. Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.

The numeric goals and information on the RA/PAS policy and operations procedures are published to all agency employee's, available on the interna/external websites and in hardcopy upon request. We also provide training during the supervisors course/ refresher courses, hiring workshops and routinely in management meetings as well as additional training provided quarterly to all employee's. The goals continue to be briefed to the leadership routinely in staff meetings and at a minimum in the annual MD-715 review.

## Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

### A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period?  
If "no", describe the agency's plan to improve the staffing for the upcoming year.

Answer Yes

In FY18 the SEEM was designated the Disability Program Manager and attended the Disability Program managers course at DEOMI. The agency will continue to analyze these programs for the need of additional personnel to support the processes.

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing reasonable accommodation requests from applicants and employees	3	0	0	carstin.k.jerzak.mil@mail.n
Processing applications from PWD and PWTD	3	0	0	kevin.r.pudwill.mil@mail.n
Section 508 Compliance	3	0	0	theodore.l.bartunek.mil@m
Architectural Barriers Act Compliance	3	0	0	Martin Yost Chief Facility Mgmt Officer martin.r.yost.mil@mail.mil
Special Emphasis Program for PWD and PWTD	1	0	0	carstin.k.jerzak.mil@mail.n

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Answering questions from the public about hiring authorities that take disability into account	6	0	0	kevin.r.pudwill.mil@mail.n

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Answer Yes

The DPM attended the Disability Program Managers course at DEOMI, receives updated information at the annual EEOC Excel or FDR Workshops. Training over the new RA/PAS policy and request procedures will be initiated in FY19 with the new policy/procedures and continue to be conducted in future FY's for managers and employees. Training for other personnel involved in processing RA/PAS is on going as requests are processed and training needs are determined.

## B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no”, describe the agency’s plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer Yes

Most funding currently comes through the CAP program for any RA requests. The recent assignment of the DPM will be funded through normal pay and travel accounts as needed. The agency supports the program with printing materials, website space and training time as needed.

## Section III: Program Deficiencies In The Disability Program

<b>Brief Description of Program Deficiency</b>	C.2.b.2. Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]		
<b>Objective</b>	Re-assign the disability program and reasonable accommodation process out of the EDI office and assign where there is not any concern regarding the firewall or conflict of interest in the management of the program and requests for reasonable accommodations.		
<b>Target Date</b>	Jan 1, 2020		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

## Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD

### A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

In FY18 USAjobs was established as the official program for the advertising of all internal and external vacancy announcements. USAjobs affords us the option to utilize schedule A and applicable Veteran status as well as open vacancy eligible for PWD/PWTD applicants to apply. Applicants voluntarily identifying as a PWD/PWTD or as a disabled Veteran are visible to us as well as on board employee's voluntarily identifying through their records is another way for the agency to identify personnel within our organization with disabilities. Contact information is provided on the vacancy announcements and public websites for applicants needing accommodations in the applicant processes.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce

In FY18 our HRO officer worked with National Guard Bureau to obtain the official authority to utilize schedule A - this is pending a final determination. The option is available on USAStaffing. We are currently authorized to consider Veteran status, to include any disability rating of a Veteran in the hiring process. this option is available in USAStaffing.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

The use of schedule A was pending in FY18. All applicant packets are forward to agency selection officials through the USAStaffing portal for both internal and external vacancies. Applicants currently meeting Veterans preference or a disability status are identified on the selection certificate and must be given first consideration once the staffing section determines the applicant meets qualification standards and can be added to the certificate. Supervisors are required to consider preferred applicants first and also provide significant justification for non-selection.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer Yes

We conduct an annual supervisors training course, refresher courses and hiring workshops where hiring authorities, such as Veterans preference and Sch A, are discussed as well as the RA/PAS policy/operating procedures. We also conduct quarterly EEO training on various topics, to include RA/PAS and we have monthly staff meetings where the current status of RA/PAS requests are updated and discussed. RA/PAS and other areas of concern are always considered when setting up/conducting employee/supervisor training.

## **B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS**

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

The EEM attempted to work with several state universities regarding the Workforce Recruitment Program and the utilization of students identifying with disabilities to apply for internships funding through NGB. However, there isn't a recruiter in SD that works the WRP program to assist the universities in building the applicant process with the students in order to create a pool for considerations of these internships. We will continue to pursue this option but until a local recruiter for WRP is established the applicant pool for our agency isn't available at this time in this program. We will continue to pursue contacts to find alternate or appropriate resources for requests and applicant pools as this program developed more in the future.

## **C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among

the new hires in the permanent workforce? If “yes”, please describe the triggers below.

- a. New Hires for Permanent Workforce (PWD) Answer No
- b. New Hires for Permanent Workforce (PWTD) Answer No

In FY18 we didn't have any triggers identified. In FY18 the majority of our positions were not eligible for consideration or hiring of PWD/PWTD - these positions are called Title 32 dual status technicians and employees/applicants are required to be in the National Guard and meet military fitness/medical standards for serving. In addition FY18 was a transition year (April - September) with the NDAA mandated conversion of 12.6% of our workforce to Title 5 civilian status. These positions will no longer require the military membership to apply/hold the position. We will re-survey our workforce in FY19 to see where our percentages are and determine the way a head to meet the federal requirements if needed. This year is the first time we've been able to analyze applicant flow data for PWD/PWTD. The data indicates we have both PWD/PWTD applying for our vacancies and with more positions available we anticipate these numbers to continue to increase. FY18 was a conversion/transition year and FY19 will be the first year this data can be considered comprehensively.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	68	10.29	0.00	4.41	0.00
% of Qualified Applicants	45	15.56	0.00	6.67	0.00
% of New Hires	7	57.14	0.00	14.29	0.00

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for MCO (PWD) Answer N/A
- b. New Hires for MCO (PWTD) Answer N/A

The mission critical occupations were all Title 32 dual status military technicians until April of 2018. The 0503 and 2210 occupations were the only two occupations opened to Title 5 civilians in the transition up to GS11/12. The remaining 4 occupation codes require a dual status/military membership in order to fill/qualify for those positions. The 0503 occupation code had 48 applicants with 4 voluntarily identifying as a PWD and 1 identifying as a PWTD. The 2210 occupation code had 10 applicants with zero voluntarily identifying as a PWD/PWTD. Interestingly, occupation codes 0346 and 8852, which require military membership to qualify, had the largest pool of PWD/PWTD applying for the open vacancies, which is a potential indication of Veterans with disabilities interested in these positions. The data isn't comprehensive enough to determine if there are any triggers.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0346LOGISTICS MANAGEMENT	14	14.29	7.14	14.29	7.14
0503FINANCIAL CLERICAL & TECHNICIAN	48	8.33	4.17	2.08	0.00

New Hires to Mission-Critical Occupations	Total  (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
2210INFORMATION TECHNOLOGY MANAGEMENT	10	0.00	0.00	0.00	0.00
8852AIRCRAFT MECHANIC	16	6.25	6.25	0.00	0.00

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Qualified Applicants for MCO (PWD) Answer N/A

b. Qualified Applicants for MCO (PWTD) Answer N/A

Internal applicant flow data was only captured from May thru September after NGB mandated all vacancy announcements will be advertised using USAjobs/Staffing for fill. This was one of the transition initiatives mentioned in the executive summary. FY19 will be the first full year to capture applicant flow data for an adequate barrier analysis. Also, the hierarchy for competitive progression needs to be determined for occupation codes 0503 and 2210, which are the only mission critical occupations open to PWD/PWTD consideration to certain GS levels. Until April of 2018 these occupations were only Title 32 dual status and required military membership in order to apply or work in them.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Promotions for MCO (PWD) Answer N/A

b. Promotions for MCO (PWTD) Answer N/A

These higher level GS levels for mission critical occupation codes require military membership in order to apply/hold those positions and the consideration of PWD/PWTD was not an option in FY18.

## Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

### A. ADVANCEMENT PROGRAM PLAN

Describe the agency’s plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

This is currently under consideration in our SDNG Merit Placement program. The fact that the majority of our upper level positions are currently Title 32 dual status military technicians or Active Guard/Reserve (AGR) (similar to active duty) positions only offers the potential for advancement of PWD/PWTD to the GS12 level in the 200/300 occupation series. These select positions may provide potential upward mobility if/when they come open through our current SDNG Merit Placement program/union agreements

based on how the agency backfills the vacancy. Schedule A was incorporated our current SDNG Merit Placement program, however the official authority to utilize the exception is being researched by NGB and our Director of HRO. Upon receiving the authority to utilize Schedule A, USAStaffing offers us the ability to promote eligible vacancies to PWD/PWTD qualified applicants through Schedule A and standard applicant processes.

## B. CAREER DEVELOPMENT OPPORTUNITES

1. Please describe the career development opportunities that the agency provides to its employees.

This is currently under consideration in our SDNG Merit Placement program. The fact that the majority of our upper level positions are currently Title 32 dual status military technicians or Active Guard/Reserve (AGR) (similar to active duty) positions only offers the potential for advancement of PWD/PWTD to the GS12 level in the 200/300 occupation series. These select positions may provide potential upward mobility if/when they come open through our current SDNG Merit Placement program/union agreements based on how the agency backfills the vacancy. Schedule A was incorporated our current SDNG Merit Placement program, however the official authority to utilize the exception is being researched by NGB and our Director of HRO. Upon receiving the authority to utilize Schedule A, USAStaffing offers us the ability to promote eligible vacancies to PWD/PWTD qualified applicants through Schedule A and standard applicant processes.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs						
Fellowship Programs						
Mentoring Programs						
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs						

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWD)

Answer N/A

b. Selections (PWD)

Answer N/A

We currently do not have any of these programs.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWTD)

Answer N/A

b. Selections (PWTD)

Answer N/A

We currently do not have any of these programs.

## C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

a. Awards, Bonuses, & Incentives (PWD) Answer No

b. Awards, Bonuses, & Incentives (PWTD) Answer No

Both PWD/PWTD are included across all of the incentive categories. Overall PWD and PWTD are included at 3.84% verses personnel without disabilities included at 17.34%. This indicates a potential trigger, however with the transitions in FY18 and the resurvey of the workforce in FY19, we will make a better assessment FY19.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards: 1-9 hours : Total Time-Off Awards Given	4	0.00	100.00	0.00	0.00
Time-Off Awards: 9+ hours : Total Time-Off Awards Given	200	4.00	96.00	0.50	3.50

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$100 - \$500: Total Cash Awards Given	29	6.90	93.10	0.00	6.90
Cash Awards: \$501+: Total Cash Awards Given	81	2.47	97.53	0.00	2.47

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance- based pay increases? If “yes”, please describe the trigger(s) in the text box.

a. Pay Increases (PWD) Answer No

b. Pay Increases (PWTD) Answer No

PWD are included at comparable rates of those without disabilities at 7.69% . (References DCPDS data tables/B9-2). PWTD did not receive any quality step increases. This is a potential trigger, however with the transitions in FY18 and the resurvey of the workforce in FY19, we will make a better assessment FY19.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Quality Step Increases (QSI): Total QSIs Awarded	22	4.55	95.45	0.00	4.55
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

a. Other Types of Recognition (PWD) Answer No

b. Other Types of Recognition (PWTD) Answer No

The incentive programs are open to all employees and include the time off, on-the-spot cash awards, performance based awards and



employee of the year cash awards. Diversity awards are available at the national level for consideration.

## D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

i. Qualified Internal Applicants (PWD) Answer N/A

ii. Internal Selections (PWD) Answer N/A

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Answer N/A

ii. Internal Selections (PWD) Answer N/A

c. Grade GS-14

i. Qualified Internal Applicants (PWD) Answer N/A

ii. Internal Selections (PWD) Answer N/A

d. Grade GS-13

i. Qualified Internal Applicants (PWD) Answer N/A

ii. Internal Selections (PWD) Answer N/A

All senior grade level positions require military membership in order to apply/qualify to compete for.

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

i. Qualified Internal Applicants (PWTD) Answer N/A

ii. Internal Selections (PWTD) Answer N/A

b. Grade GS-15

i. Qualified Internal Applicants (PWTD) Answer N/A

ii. Internal Selections (PWTD) Answer N/A

c. Grade GS-14

i. Qualified Internal Applicants (PWTD) Answer N/A

ii. Internal Selections (PWTD) Answer N/A

## d. Grade GS-13

- |   |        |     |
|---|--------|-----|
| i. Qualified Internal Applicants (PWTD) | Answer | N/A |
| ii. Internal Selections (PWTD)          | Answer | N/A |

All senior grade level positions require military membership in order to apply/qualify to compete for.
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3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                             |        |     |
|-----------------------------|--------|-----|
| a. New Hires to SES (PWD)   | Answer | N/A |
| b. New Hires to GS-15 (PWD) | Answer | N/A |
| c. New Hires to GS-14 (PWD) | Answer | N/A |
| d. New Hires to GS-13 (PWD) | Answer | N/A |

All senior grade level positions require military membership in order to apply/qualify to compete for.
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4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                              |        |     |
|------------------------------|--------|-----|
| a. New Hires to SES (PWTD)   | Answer | N/A |
| b. New Hires to GS-15 (PWTD) | Answer | N/A |
| c. New Hires to GS-14 (PWTD) | Answer | N/A |
| d. New Hires to GS-13 (PWTD) | Answer | N/A |

All senior grade level positions require military membership in order to apply/qualify to compete for.
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5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |  |        |     |
|--|--------|-----|
| a. Executives                          |        |     |
| i. Qualified Internal Applicants (PWD) | Answer | N/A |
| ii. Internal Selections (PWD)          | Answer | N/A |
| b. Managers                            |        |     |
| i. Qualified Internal Applicants (PWD) | Answer | N/A |
| ii. Internal Selections (PWD)          | Answer | N/A |
| c. Supervisors                         |        |     |

- |  |        |     |
|--|--------|-----|
| i. Qualified Internal Applicants (PWD) | Answer | N/A |
| ii. Internal Selections (PWD)          | Answer | N/A |

N/A. The majority of the career development opportunities in FY18 come from the military sector based on rank, branch, military occupation, education and leadership background. Merit placement is currently under consideration based on the potential for advancement of PWD/PWTD to the GS12 level in the 200/300 occupation series. These select positions may provide potential upward mobility if/when they come open through our current SDNG Merit Placement program/union agreements based on how the agency backfills the vacancy. Schedule A and Veterans preference/disability are incorporated our current SDNG Merit Placement program, however the official authority to utilize Sch A is being researched by NGB and our Director of HRO. Upon receiving the authority to utilize Schedule A, USAStaffing offers us the ability to promote eligible vacancies to PWD/PWTD qualified applicants through Schedule A and standard applicant processes.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

- |   |        |     |
|---|--------|-----|
| i. Qualified Internal Applicants (PWTD) | Answer | N/A |
| ii. Internal Selections (PWTD)          | Answer | N/A |

b. Managers

- |   |        |     |
|---|--------|-----|
| i. Qualified Internal Applicants (PWTD) | Answer | N/A |
| ii. Internal Selections (PWTD)          | Answer | N/A |

c. Supervisors

- |   |        |     |
|---|--------|-----|
| i. Qualified Internal Applicants (PWTD) | Answer | N/A |
| ii. Internal Selections (PWTD)          | Answer | N/A |

N/A. The majority of the career development opportunities in FY18 come from the military sector based on rank, branch, military occupation, education and leadership background. Merit placement is currently under consideration based on the potential for advancement of PWD/PWTD to the GS12 level in the 200/300 occupation series. These select positions may provide potential upward mobility if/when they come open through our current SDNG Merit Placement program/union agreements just based how the agency backfills the vacancy. Schedule A and Veterans preference/disability are incorporated our current SDNG Merit Placement program, however the official authority to utilize Sch A is being researched by NGB and our Director of HRO. Upon receiving the authority to utilize Schedule A, USAStaffing offers us the ability to promote eligible vacancies to PWD/PWTD qualified applicants through Schedule A and standard applicant processes.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                                    |        |     |
|------------------------------------|--------|-----|
| a. New Hires for Executives (PWD)  | Answer | N/A |
| b. New Hires for Managers (PWD)    | Answer | N/A |
| c. New Hires for Supervisors (PWD) | Answer | N/A |

N/A. The majority of the career development opportunities in FY18 come from the military sector based on rank, branch, military occupation, education and leadership background. Merit placement is currently under consideration based on the potential for

advancement of PWD/PWTD to the GS12 level in the 200/300 occupation series. These select positions may provide potential upward mobility if/when they come open through our current SDNG Merit Placement program/union agreements just based how the agency backfills the vacancy. Schedule A and Veterans preference/disability are incorporated our current SDNG Merit Placement program, however the official authority to utilize Sch A is being researched by NGB and our Director of HRO. Upon receiving the authority to utilize Schedule A, USAStaffing offers us the ability to promote eligible vacancies to PWD/PWTD qualified applicants through Schedule A and standard applicant processes.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                                     |        |     |
|-------------------------------------|--------|-----|
| a. New Hires for Executives (PWTD)  | Answer | N/A |
| b. New Hires for Managers (PWTD)    | Answer | N/A |
| c. New Hires for Supervisors (PWTD) | Answer | N/A |

N/A. The majority of the career development opportunities in FY18 come from the military sector based on rank, branch, military occupation, education and leadership background. Merit placement is currently under consideration based on the potential for advancement of PWD/PWTD to the GS12 level in the 200/300 occupation series. These select positions may provide potential upward mobility if/when they come open through our current SDNG Merit Placement program/union agreements just based how the agency backfills the vacancy. Schedule A and Veterans preference/disability are incorporated our current SDNG Merit Placement program, however the official authority to utilize Sch A is being researched by NGB and our Director of HRO. Upon receiving the authority to utilize Schedule A, USAStaffing offers us the ability to promote eligible vacancies to PWD/PWTD qualified applicants through Schedule A and standard applicant processes.

## Section VI: Plan to Improve Retention of Persons with Disabilities

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer N/A

We do not utilize Schedule A at this time.

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

- |                                  |        |    |
|----------------------------------|--------|----|
| a. Voluntary Separations (PWD)   | Answer | No |
| b. Involuntary Separations (PWD) | Answer | No |

The PWD percentage of 66% exceeds the persons without disabilities percentage of 33% in the involuntary separation category. There was a total of 12 involuntary separations for our agency in FY18, 10 without disabilities and 2 PWD. The inclusion percentages may indicate a trigger but the actual numbers do not reflect a trigger. We conduct exit surveys and the involuntary separations are generally based on the loss of military membership due to involuntary discontinued service or medical discharges of

Title 32 dual status military technicians.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permenant Workforce	407	5.41	94.59
Total Separations	42	7.14	92.86
Voluntary Separations	30	3.33	96.67
Involuntary Separations	12	16.67	83.33

3. Using the inclusion rate as the benchmark, did the percentage of PWTB among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger below.

a. Voluntary Separations (PWTB) Answer No

b. Involuntary Separations (PWTB) Answer No

We didn't lose any PWTB in FY18.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permenant Workforce	407	0.25	99.75
Total Separations	42	0.00	100.00
Voluntary Separations	30	0.00	100.00
Involuntary Separations	12	0.00	100.00

4. If a trigger exists involving the separation rate of PWD and/or PWTB, please explain why they left the agency using exit interview results and other data sources.

N/A The PWD percentage of 66% exceeds the persons without disabilities percentage of 33% in the involuntary separation category. There was a total of 12 involuntary separations for our agency in FY18, 10 without disabilities and 2 PWD. The inclusion percentages may indicate a trigger but the actual numbers do not reflect a trigger. We conduct exit surveys and the involuntary separations are generally based on the loss of military membership due to involuntary discontinued service or medical discharges of Title 32 dual status military technicians.

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

<https://sd.ng.mil/Pages/Home.aspx>

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

<https://sd.ng.mil/Pages/Home.aspx>

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

We updated our public/external website with the appropriate 508 compliance requirements. We posted our updated RA/PAS policy/request procedures on the public/external website and update all contact information for personnel to contact us for other options available to provide the agency information to them. We also include agency contact information and the option for applicants to request RA/PAS on all vacancy announcements. The majority of our facilities were designed for military use, however we are taking a systematic approach to installing automatic doors for accessibility in any facility where our Title 5 civilian personnel may be required to conduct facility or unit assistance visits for their respective programs.

### **C. REASONABLE ACCOMMODATION PROGRAM**

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

All request for RA were provided through the CAP program and not processed through our local RA procedures in FY18. FY19 will be the first year we utilize our new RA/PAS request procedures and track the average time to process a request.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

In FY18 we initiated a major update to our policy and request procedures for RA/PAS in conjunction with the EEOC feedback process. FY19 will be the first year for full implementation of these new products and the first year of full measurement to determine effectiveness. No EEO complaints were filed based on denial of a RA/PAS in FY18. All request for RA were provided through the CAP program and not processed through our local RA procedures in FY18. Employees were very satisfied with the results provided by through the CAP program. Training for supervisors and employees is conducted during the supervisor course/ refresher courses, hiring workshop and new employee orientations. Additional training/briefings is conducted during staff meetings or as scheduled.

### **D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE**

*Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.*

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

In FY18 we initiated a major update to our policy and request procedures for RA/PAS in conjunction with the EEOC feedback process. FY19 will be the first year for full implementation of these new products and the first year of full measurement to determine effectiveness. No EEO complaints were filed based on denial of a RA/PAS in FY18. All request for RA were provided through the CAP program and not processed through our local RA procedures in FY18. Employees were very satisfied with the results provided by through the CAP program. Training for supervisors and employees is conducted during the supervisor course/ refresher courses, hiring workshop and new employee orientations. Additional training/briefings is conducted during staff meetings or as scheduled.

## **Section VII: EEO Complaint and Findings Data**

## A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

Answer N/A

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer N/A

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

N/A We didn't have any EEO complaints based on denial of a RA/PAS in FY18.

## B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer N/A

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer N/A

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

N/A We didn't have any EEO complaints based on denial of a RA/PAS in FY18.

## Section VIII: Identification and Removal of Barriers

*Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.*

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer No

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer N/A

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

The only limitation is the ability to pull the applicant flow data. We are working with NGB to attempt to obtain more accurate data for the FY19 MD-715 report.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

The updating and publication of our agencies RA/PAS policy and request procedures creates a channel for employees to request RA/PAS accommodations. These documents clarify the process and time lines for requests and will also allow us to measure the timeliness and effectiveness of these processes. This establishes the baseline for the program. The agency established a Disability Program Manager and provided training for the DPM, which puts a subject matter expert in our workforce to provide future training and insight into ongoing and future initiatives for PWD/PWTD applicants and employees. Our website became 508 compliant and now offers options and a complaint process for PWD/PWTD to receive our information and an avenue for resolution if there is a complaint. These improvements and initiatives all show a progressive approach to the inclusion of PWD/PWTD in our workforce.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

We will initiate and track the effectiveness of our RA/PAS request process. Continually evaluate our policy/procedures for improvements and compliance. Incorporated the RA/PAS policy and request procedures into the supervisors course/refresher course and the hiring workshops as well as quarterly employee training in FY19. Initiate routine case reviews of RA/PAS requests to ensure timely processing. Determine the feasibility of established a specific line item budget to support RA/PAS requests.